1 2 3 4 5	John D. Tennert, III (SBN 11728) Wade Beavers (SBN 13451) FENNEMORE CRAIG, P.C. 7800 Rancharrah Parkway Reno, Nevada 89511 Tel: (775) 788-2212 Fax: (775) 786-1177 jtennnert@fennemorelaw.com wbeavers@fennemorelaw.com		
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12	UNITED OF A TEC DICTION COLUMN		
13	UNITED STATES DISTRICT COURT		
14	DISTRICT OF NEVADA		
15	YURIDIA CHAVEZ-HERRERA,	Case No. 2:19-cv-01327-GMN-BNW	
16	Plaintiff,		
17	VS.	STIPULATION AND ORDER TO EXTEND	
18	SHAMROCK FOODS COMPANY, an	DEADLINE FOR DEFENDANTS TO FILE THEIR OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL DISCOVERY	
19	Arizona foreign corporation; JOSE PAZ; DOES II through X; and ROE	RESPONSES (ECF 113)	
20	CORPORATIONS I through X, inclusive,	(FIRST REQUEST)	
21	Defendants.		
22	Plaintiff Yuridia Chavez-Herrera and Defendants Shamrock Foods Company and Jose Paz,		
23	by and through undersigned counsel, hereby stipulate and agree that Defendants Shamrock Foods		
24	Company and Jose Paz's shall have a one-week extension, until August 28, 2023, to file their		
25	Opposition to Plaintiff's Motion to Compel Discovery Responses (ECF 113). Pursuant to LR IA 6-1,		
26	this is the first request to extend the deadline to file an opposition to Plaintiff's Motion. The extension		
27	is requested due to conflicts in defense counsel's schedule, including depositions in this and other		
28 FENNEMORE.	cases and a hearing that one of defense counsel is involved in this week. The request is not sought		

7800 Rancharrah Parkway Reno, NV 89511 775-788-2200

1 for the purposes of delay and will not result in prejudice to the parties or the Court. The hearing on 2 Plaintiff's Motion is currently set for October 3, 2023. 3 Dated: August 17, 2023. Dated: August 17, 2023. 4 FENNEMORE CRAIG, P.C. **CLAGGETT & SYKES LAW FIRM** 5 By: /s/ *Douglas C. Northup* By: /s/ Brian Blankenship (w/ consent) Douglas C. Northup (pro hac vice) Sean K. Claggett, Esq. (SBN 8407) 6 2394 E. Camelback Rd., Suite 600 Brian Blankenship, Esq. (SBN 11522) Scott E. Lundy, Esq. (SBN 14235) 7 Phoenix, Arizona 85016 Vanessa M. Turley, Esq. (SBN 14635) 8 4101 Meadows Lane, Suite 100 -and-Las Vegas, Nevada 89107 9 John D. Tennert, III Esq. (SBN 11728) Wade Beavers, Esq. (SBN 13451) -and-10 7800 Rancharrah Parkway 11 Reno, Nevada 89511 Benjamin J. Bingham, Esq. (SBN 7280) Ida M. Ybarra, Esq. (SBN 11327) 12 Attorneys for Defendants **BENSON & BINGHAM** 11441 Allerton Park Drive, Suite 100 13 Las Vegas, Nevada 89135 14 Attorneys for Plaintiff 15 16 17 18 IT IS SO ORDERED: 19 20 UNITED STATES MAGISTRATE JUDGE 21 August 18, 2023 22 Dated: 23 24 25 26 27

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1	<u>CERTIFICATE OF SERVICE</u>	
2	Pursuant to FRCP 5(b), I hereby certify that I am an employee of Fennemore Craig, P.C., and	
3	that on this date, I served, or caused to be served, a true and correct copy of the foregoing document	
4	via electronic filing through the Court's CM/ECF system to the attorneys associated with this case:	
5	Benjamin J. Bingham, Esq. Sean K. Claggett, Esq.	
6	Ida M. Ybarra, Esq.Brian Blankenship, Esq.BENSON & BINGHAMScott E. Lundy, Esq.	
7	11441 Allerton Park Drive, Suite 100 Vanessa M. Turley Las Vegas, Nevada 89135 CLAGGETT & SYKES LAW FIRM	
8	4101 Meadows Lane, Suite 100 Las Vegas, Nevada 89107	
9		
10	Attorneys for Plaintiff Attorneys for Plaintiff	
11	Dated: August 17, 2023.	
12	/s/ Phyllis Warren Employee of Fennemore Craig, P.C.	
13	29747880 Employee of 1 ememore eraig, 1 .C.	
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